

In the matter of RM-10805, RM-10806, RM-10807, RM-10808, RM-10809, RM-10810, & RM-10811

I hold an Amateur Extra class license and entered the hobby/service of Amateur Radio with the Novice Class license. I was in favor of eliminating the 13WPM and 20WPM requirements. My reasons for opposing the elimination of the Morse code requirement entirely are mainly based on the feeling: "I had to do it, why not everyone else?"

Each of the referenced petitions provides a suggestion to deal with the opportunity of the FCC to eliminate the Morse code proficiency requirements in the Amateur Radio Service. It isn't mandatory that the FCC eliminate the requirement. I offer these comments as a standard response to each.

It is possible for the FCC to make no changes to the licensing requirements. What would be gained? This really needs to be studied thoroughly.

It is also possible that the FCC could just simply eliminate the Element 1, Morse Code Proficiency Exam from the licensing requirements, without further modification of any privileges for any existing license class. If that would be the decision, then that is what I live with. Most of the referenced petitions propose an expansion of privileges for Technician license holders that have not passed the current Element 1. I am not in favor of that and there is really no justification for it. If Element 1 is eliminated from testing requirements, keep all license privileges as they are currently defined. Everyone would still have the same technical requirements for upgrade with the benefit of removal of the Element 1 requirement.

I have some suggestions to add that are a little different than those proposed.

For future revisions of question pools, I believe there is merit to expanding the pools to include more technically oriented questions for digital modes and evolving communication technology. I do not believe that the Technician Class test is or has been sufficiently rigorous to demonstrate technical competence in order to expand privileges for current technician licensees.

If the code requirement is eliminated, then I believe there is merit to expand the HF phone bands for Amateur Extra Class licensees only, but retain all other license classes at current privileges. This would add incentive to Amateur Radio Operators to work to upgrade to the top class. Right now there really isn't much in the way of an incentive. Every time an expansion of privileges occurs or is proposed it would appear that it is focused on the lower classes.

Keep it simple and cost effective, or do nothing.

N8KBR